

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

NANCY ALBRIGHT and SARAH  
RODHOUSE, individually and as the  
representatives of a class of similarly  
situated persons,

Plaintiffs,

vs.

Case No. 4:11:CV-01691AGF

THE BI-STATE DEVELOPMENT  
AGENCY OF THE MISSOURI-ILLINOIS  
METROPOLITAN DISTRICT d/b/a  
METRO,

Defendants.

**AFFIDAVIT OF RACHEL STOERING  
REGARDING CLASS CLAIMS**

STATE OF MINNESOTA       )  
                                      ) SS:  
COUNTY OF HENNEPIN     )

RACHEL STOERING, being first duly sworn upon oath, states as follows:

1. I submit this affidavit in order to provide the Court and the parties to the above-captioned litigation with information regarding BMC Group's analysis of the class claims submitted in the above-captioned litigation. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently to the facts set forth in this Affidavit.

2. I am a Director for BMC Group ("BMC"), with offices at 18675 Lake Drive East, Chanhassen, Minnesota. BMC was engaged as Administrator for the Settlement by the parties to this action.

3. At the close of the claims period on July 3, 2013, BMC received 37 Electronic Claim Forms and 14 Paper Claim Forms for a total of 51 claims. As of July 11, 2013, BMC received 1 additional Electronic Claim Form ("Late Claim"). Of those received claims, 17 are "Option 1" Claims, 15 are "Option 2" Claims, and 19 are "Option 3" Claims. The Late Claim received was an "Option 3" claim.

4. As of July 11, 2013, BMC received 52 claim forms from potential claimants in this matter. Below is a summary of what we have received:

**Group One (17 Claimants):**

- (i) \$30 payment (face value of \$30 per valid claim)
  - a. 9 Claimants
    - i. 5 valid
    - ii. 4 invalid (no or inadequate documentation)
- (ii) One Monthly Pass (face value of \$72 per valid claim)
  - a. 2 Claimants
    - i. 1 valid
    - ii. 1 invalid (no or inadequate documentation)
- (iii) Two 10 Ride passes (face value of \$60 per valid claim)
  - a. 6 Claimants
    - i. 5 valid
    - ii. 1 invalid (no or inadequate documentation)

**Group Two (15 Claimants):**

- (i) Three roundtrip tickets (face value of \$13.50 per valid claim)
  - a. 15 Claimants
    - i. 13 valid
    - ii. 2 invalid (no or inadequate documentation)

**Group Three (20 Claimants)**

- (i) One one-ride ticket (face value of \$2.25 per valid claim)
  - a. 20 Claimants
    - i. 19 valid
    - ii. 1 invalid (filed a late claim on 7/9/13 (deadline was 7/3/13))

5. In summary, BMC has 43 valid claimants. BMC has 9 claimants with invalid claim forms because they provide no documentation, inadequate documentation, or filed late.

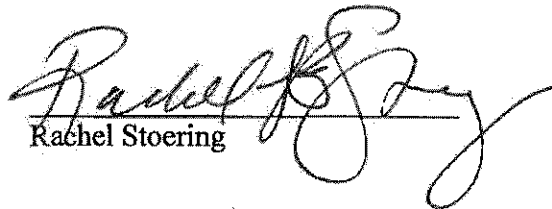
6. The face value of each particular claim is based on representations of the parties that are contained in the claim form and long form notice that were provided to BMC by counsel for Plaintiffs and Defendant.

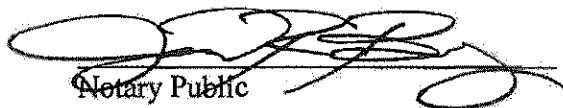
7. Based on the 43 valid claims described above and the face value of each particular claim, the aggregate face value of all valid claims that were properly submitted to BMC during the claims period \$740.25.

8. The total fees billed by BMC to date on this matter total \$8,221.44.

I declare under penalty of perjury under the laws of the State of Minnesota that the foregoing is true and correct.

Subscribed and sworn to before me  
This 24th day of July 2013

  
Rachel Stoering

  
Notary Public

